

Jordan L. Lurie (SBN 130013)
Jordan.Lurie@capstonelawyers.com
Robert K. Friedl (SBN 134947)
Robert.Friedl@capstonelawyers.com
Tarek H. Zohdy (SBN 247775)
Tarek.Zohdy@capstonelawyers.com
Cody R. Padgett (SBN 275553)
Cody.Padgett@capstonelawyers.com
Capstone Law APC
1840 Century Park East, Suite 450
Los Angeles, California 90067
Telephone: (310) 556-4811
Facsimile: (310) 943-0396

Attorneys for Plaintiffs

DYKEMA GOSSETT PLLC
John M. Thomas (SBN 266842)
jthomas@dykema.com
Krista L. Lenart (admitted pro hac vice)
klenart@dykema.com
David M. George (admitted pro hac vice)
dgeorge@dykema.com
2723 South State Street, Suite 400
Ann Arbor, MI 48104
Telephone: (734) 214-7673
Facsimile: (855) 264-3653

SHOOK, HARDY & BACON L.L.P.
Amir M. Nassihi (SBN 235936)
anassihi@shb.com
One Montgomery, Suite 2700
San Francisco, California 94104
Telephone: (415) 544-1900
Facsimile: (415) 391-0281

Attorneys for Defendant

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

JEAN MACDONALD, VERONICA H.
AGUIRRE, and BRIAN C. BARBEE,
individually, and on behalf of a class of similarly
situated individuals,

Plaintiffs,

vs.

FORD MOTOR COMPANY,

Defendant.

Case No. 3:13-cv-02988-JST

CLASS ACTION

**STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING PRODUCTION OF
PERSONALLY IDENTIFIABLE
INFORMATION**

Judge: Hon. John S. Tigar

1 Plaintiffs JEAN MACDONALD, VERONICA H. AGUIRRE, and BRIAN C. BARBEE
2 (“Plaintiffs”), and Defendant FORD MOTOR COMPANY (“Defendant”) (collectively referred to as
3 the “Parties”), by and through their respective counsel, hereby stipulate to the following:

4 Ford will be producing a document (MCN3 009661) which contains Personally Identifiable
5 Information of its customers, which may include name, mailing address, telephone numbers, email
6 addresses and social media account information (“PII”). PII is contained in the “Comments”
7 section of records from Ford’s FMC360 (customer contacts) and GCQIS (technical contacts with
8 dealers) databases. Ford has advised Plaintiffs’ counsel that the process of manually reviewing and
9 redacting such PII from the “Comments” section of each contact will be time consuming and
10 expensive.

11 In an effort to facilitate expedited production of this document, and any other similar
12 documents which contain PII, the parties agree as follows:

13 IT IS ORDERED THAT:

14 1. Any PII contained in documents produced by Ford shall be treated as “Confidential”
15 pursuant to the Protective Order entered in this matter. (DE 67).

16 2. Absent an Order of this Court, neither Plaintiffs nor their counsel shall use PII
17 contained in documents produced by Ford to communicate with any Ford customer, unless otherwise
18 agreed.

19 3. Ford shall produce the document mentioned herein within 3 business days of the
20 entry of this Order.

21
22 Dated: August 12, 2015

Respectfully submitted,

23 CAPSTONE LAW APC

24
25 By: /s/ Tarek H. Zohdy

26 Tarek H. Zohdy
27 *Attorney for Plaintiffs*

1 Dated: August 12, 2015

Respectfully submitted,

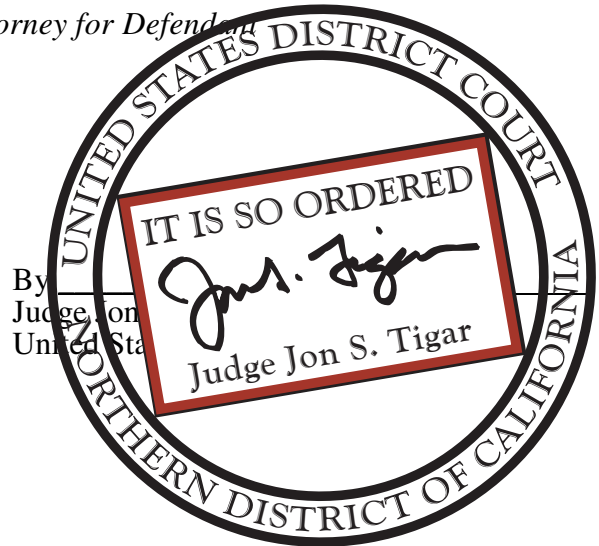
2 DYKEMA GOSSETT PLLC

3
4 By: /s/ David M. George
David M. George

5 Attorney for Defendant

6
7 **IT IS SO ORDERED.**

8
9 Dated: August 18, 2015



Certification of Compliance with N.D. Cal. L.R. 5.1(i)(3)

I hereby certify that pursuant to N.D. Cal. L.R. 5.1(i)(3), I have obtained the authorization from the above signatories to file the above-referenced document, and that the above signatories concur in the filing's content.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 12, 2015.

By: /s/ Amir N. Nassihi

Amir M. Nassihi (SBN 235936)
anassihi@shb.com
One Montgomery, Suite 2700
San Francisco, California 94104
Telephone: (415) 544-1900
Facsimile: (415) 391-0281